



crankshaft failure[s] or the attempt to determine the cause(s) of the failure[s]." County's Request, par. 3. LILCO has not objected to this request, but no such documents, other than LILCO's "master plan" for the crankshaft failure analysis of diesel no. 102, have been provided. LILCO has not represented that such documents are non-existent.

2. That LILCO notify and keep the County apprised of all "significant developments" regarding the crankshaft failures and LILCO's efforts to determine the cause(s) of the failures, and that it give the County reasonable notice of all examinations, tests and analyses to be carried out in connection with the crankshaft failures and all meetings concerning the crankshaft failures which are attended by Staff personnel or to which Staff personnel are invited to attend. County's Request, pars. 1, 2, 4 and 5. LILCO has not specifically objected to these requests, and, to date, some information which may otherwise not have been made available has been provided to the County.<sup>2/</sup> Nevertheless, for the most part, LILCO has chosen to notify the County of developments concerning the crankshaft failures only when required to do

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<sup>2/</sup> LILCO, through its counsel, orally advised the County on August 13, 1983 that the crankshaft on diesel no. 102 had severed. Thereafter, the County received no information directly from LILCO regarding this crankshaft failure until August 23, when counsel for LILCO "responded" (see Exhibit 3) to the County's Request. The County was advised during the week of August 22 of failures to the crankshafts in diesel nos. 101 and 103. Further information was provided in LILCO's "master plan," a copy of which was received by the County on August 25, and in LILCO's status report to the Board and the parties of that same date.

so by the Board (the August 25 status report) or when information was required to be reported under 10 CFR Section 50.55(e) (discovery of the crankshaft failures).

3. That LILCO permit representatives and consultants of the County to witness examinations, tests and analyses carried out "in connection with the attempt to determine the cause(s) of the crankshaft failure[s]" and that the County's representatives and consultants be invited by LILCO to attend any meetings to be attended by NRC Staff personnel, or to which such Staff personnel are invited. County's Request, pars. 2 and 4. LILCO has not objected to these requests but, to date, it has generally notified the County of examinations, tests and analyses after-the-fact. LILCO has given no indication that it would be willing to permit the County's representatives and consultants to witness any examinations, tests or analyses of the failed crankshafts. To the County knowledge, there have been no meetings concerning the crankshaft failures which have involved NRC Staff personnel. LILCO, however, has not indicated a willingness to invite the County's representatives and consultants to attend any such meetings, should they be held.

## II. Discussion

### A. Category 1: Documents Pertaining to the Crankshaft Failures and Attempts to Determine the Cause(s) of Such Failures

As noted above, LILCO has not objected to the County's request to provide existing documents pertaining to the crankshaft failures and attempts to determine the cause(s) of such failures.

If such documents exist, they are relevant and material to the County's contentions regarding the Shoreham diesel generators. This relevancy is established because no one at this time can preclude the possibility that the crankshaft failures are related to the cylinder head cracking and vibration issues which are part of the existing diesel contention. To assess the potential relationship, the County must have access to the relevant data and documents.<sup>3/</sup> Accordingly, matters relating to the crankshaft failures on all three Shoreham diesels presently are relevant to

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3/ The relevancy of the requested documents to the County's diesel contentions has not been denied by LILCO or the Staff. For example, in the LILCO Report and Request for Temporary Deferral, dated August 15, 1983, LILCO stated that the cause of the crankshaft failure on diesel no. 102 is unknown and the time necessary to determine the cause(s) and the ramification(s) of the failure is uncertain. In LILCO's Supplemental Report on the Diesel Generators, dated August 16, 1983, LILCO stated that in its "preliminary view" the breaking of the crankshaft on diesel no. 102 is not related to issues raised in Suffolk County's contention regarding the cracking of cylinder heads, but that "no firm conclusions" can yet be reached. The uncertainties surrounding the cause(s) and the ramification(s) of not only the failure to diesel no. 102, but also the failures to diesel nos. 101 and 103, were reemphasized in LILCO's August 25 status report.

The Staff, in its Response to the LILCO Report, dated August 16, 1983, indicated that the relationship between the crankshaft failure on diesel no. 102 and the cylinder head aspect of the County's contention "cannot be ascertained prior to dismantling the disabled diesel to determine the cause of failure." It also noted that the crankshaft failure may impact upon the County's contention regarding vibration of the Shoreham emergency diesels. The Staff's August 25 status report makes clear that the Staff's position on these matters has not changed.

the County's diesel generator contentions, and any existing documents pertaining to the crankshaft failures or the attempt to determine the cause(s) of the failures should be provided to the County.<sup>4/</sup>

It is important to note that the County's request includes documents, whether preliminary or final, "as and when they come into LILCO's possession or under its control." County's Request, par. 3. Suffolk County is requesting ongoing discovery. Thus, although there may now be few documents pertaining to the crankshaft failures or the attempts to determine the cause(s) of the failures, Suffolk County is requesting that the Board issue an order compelling LILCO to provide to the County the documents requested in paragraph 3 of the County's Request within a reasonable time after such documents come into existence.

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<sup>4/</sup> An example of such a document is the report on the analysis of the oil in diesel no. 102 which was referred to by Mr. Joseph Novarro, Assistant to LILCO's Chairman of the Board, in comments to Governor Cuomo's Shoreham Commission on August 17, 1983. See County's Request, fn. 1.

A further example is provided by the LILCO status report of August 25, which stated that the final failure analysis report on the crankshaft for diesel no. 102 will be provided to the Board and parties to this proceeding. The County looks forward to receiving this report. However, the County also wishes to be provided with a copy of the preliminary failure analysis mentioned by LILCO in its status report. The County is entitled to complete information regarding the crankshaft failures. Such information includes more than documents which LILCO characterizes as "final" documents and which it chooses, in its discretion, to provide to the County.

B. Category 2: Notifying and Advising the County of Significant Developments and Efforts to Determine the Cause(s) of the Failures, and Providing Notice to the County of Examinations, Tests and Analyses and of Meetings with the Staff

On the same day that it requested discovery from LILCO, the County also requested the cooperation of the Staff concerning the failed crankshafts and attempts to determine the cause(s) of the failures. A copy of the County's August 18, 1983 letter to counsel for the Staff is attached hereto as Exhibit 2.

The Staff agreed to cooperate with the County in matters concerning the crankshaft failures. LILCO, however, has not agreed to the discovery sought by the County. Indeed, LILCO has not bothered to respond in any meaningful way to the County's Request. The August 23 LILCO letter which purports to respond to the County's Request (and which is attached as Exhibit 3) merely invites the County to explain why "matters relating to the crankshaft failure[s] are clearly relevant to the County's diesel generator contentions." It then summarizes the information intended to be included by LILCO in its August 25 status report. There was, however, no "response" to the discovery sought by the County; indeed, the specific discovery requests set forth by the County in its August 18 letter were not even mentioned in passing. Instead, the County was advised that LILCO would "reconsider" the County's Request only when the County explains "precisely" how the crankshaft failures are related to the "issues that have been previously raised by the County and admitted by the Board" -- that is, the cylinder head cracking and the vibration issues.

As noted above, there can be no precise conclusions regarding the relationship between the crankshaft failures and the cylinder head/vibration aspects of the County's diesel contentions until the cause or causes of the crankshaft failures are determined. Similarly, there can be no more precise focusing of discovery than the County's Request. The County, however, is entitled to complete information regarding the crankshaft failures until it is determined that there is no relationship between the crankshaft failures and either the cylinder head cracking issue or the vibration issue. Since such a determination has not been made, LILCO should be compelled to comply with the County's discovery requests.

The information requested by the County under Category 2 is narrow, relevant and focused and is confined to the crankshaft failures and the attempt to determine the cause(s) of the failures. Indeed, the County is only asking that it be notified and kept apprised of "significant" developments regarding the crankshaft failures and LILCO's efforts to determine the cause(s) of the failures. The County's Request also would require LILCO to give the County reasonable notice of examinations, tests and analyses to be carried out in connection with the attempt to determine the cause(s) of the crankshaft failures and all meetings which include NRC Staff personnel or to which such Staff personnel are invited.

C. Category 3: Permitting the County's Representatives and Consultants to Witness Examinations, Tests and Analyses and to Attend Meetings Concerning the Crankshaft Failures

The County has requested LILCO to permit representatives and consultants of the County to witness examinations, tests and analyses to be performed in connection with attempts to determine the cause(s) of the crankshaft failures. County's Request, par. 2. In addition, the County has requested LILCO to permit the County's representatives and consultants to attend all meetings concerning the crankshaft failures which are to be attended by NRC Staff personnel, or to which such Staff personnel are invited. County's Request, par. 4. LILCO has not responded to these requests by the County.

The County makes these requests so that it can gain necessary information concerning the crankshaft failures and the possible relationship to the cylinder head cracking and/or the vibration aspects of the County's diesel contention. The County does not desire to interfere in any way with LILCO's efforts to investigate and remedy the crankshaft problems and it would take every precaution in this regard. For example, the County would coordinate any visits by its representatives and consultants to the Shoreham plant or offsite facilities with LILCO beforehand. In addition, the County would make every effort to limit the occasions for which access to the plant or offsite facilities would be sought. To the extent possible, the County would hope that complete information concerning the crankshaft failures and attempts to determine the cause(s) of the failures could be obtained in ways other than directly witnessing such examinations,

tests and analyses. Meetings between LILCO and the NRC Staff are an example of a way in which such information can be obtained, and, for this reason, the County would likely attend all meetings concerning the crankshaft failures which are attended by the NRC Staff, or to which such Staff personnel are invited.<sup>5/</sup>

### III. Conclusion

For the foregoing reasons, Suffolk County requests that the Board issue an order compelling LILCO: (1) to provide the County with copies of the documents requested in paragraph 3 of the County's Request; (2) to notify and keep the County apprised of the matters set forth in paragraphs 1, 2, 4 and 5 of the County's Request and to permit the representatives and consultants of the County to witness examinations, tests and analyses to be performed in connection with attempts to determine the cause(s) of the crankshaft failures; and (3) to permit the County's representatives and consultants to attend all meetings concerning the crankshaft failures which are to be attended by NRC Staff personnel, or to which such personnel are invited.

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<sup>5/</sup> While this Motion was being typed on August 26, counsel for the County were advised of, and invited to attend, a meeting concerning the crankshaft failure on diesel no. 102 between LILCO and the NRC Staff on September 2, 1983. Notice of this meeting was provided by the Staff. The County will attend the September 2 meeting, which it understands will be held at the Shoreham plant. It is possible that the notice of and invitation to attend the September 2 meeting are indicative of LILCO's willingness to permit the representatives and consultants of the County to attend meetings concerning the crankshaft failures which are attended by the NRC Staff or to which such Staff personnel are invited.

Respectfully submitted,

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*Michael S. Miller*

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Attorneys for Suffolk County

Date: August 26, 1983

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August 18, 1983

(BY TELECOPIER)

T. S. Ellis, Esq.  
Hunton & Williams  
707 East Main Street  
P.O. Box 1535  
Richmond, Virginia 23212

Re: Request for Discovery

Dear Tim:

Last Saturday you informed me by telephone that the crankshaft on diesel generator No. 102 had broken in two during testing with the "new-style" Transamerica Delaval cylinder heads installed. In the LILCO Report and Request for Temporary Deferral, dated August 15, 1983, LILCO stated that the cause of the failure is unknown, and the time necessary to determine the cause and the ramifications of the failure is uncertain. In LILCO's Supplemental Report on the Diesel Generators, dated August 16, LILCO stated that in its "preliminary view" the breaking of the crankshaft is not related to issues raised in Suffolk County's contention regarding the cracking of cylinder heads, but that "no firm conclusions" can yet be reached.

The NRC Staff, in its Response to the LILCO Report, dated August 16, 1983, indicated that the relationship between the crankshaft failure and the cylinder head issue "cannot be ascertained prior to dismantling the disabled diesel to determine the cause of failure." It also noted that the crankshaft failure may impact upon the County's contention regarding vibration of the Shoreham emergency diesels. The County, in its filing dated August 15, 1983, agreed that the crankshaft failure may be related to both the cylinder head and the vibration issues, but no conclusions can be reached until the cause of the crankshaft breaking is ascertained.

Accordingly, matters relating to the crankshaft failure are clearly relevant to the County's diesel generator

T. S. Ellis, Esq.  
August 18, 1983  
Page 2

contentions. Therefore, Suffolk County is requesting ongoing discovery (as set forth below) as to the crankshaft failure until it is determined to the County's or the Board's satisfaction that there is no relationship between the breaking of the crankshaft and either the cylinder head cracking issue or the vibration issue. The County hereby requests:

1. That LILCO promptly notify the County of its plans (and any changes thereto) to determine the cause(s) of the crankshaft failure, including the kinds of examinations, tests and analyses it will carry out, the schedules for them, and the identification of persons who will be involved in the failure analyses and their responsibilities.
2. That LILCO give the County reasonable advance notice of all examinations, tests and analyses to be carried out in connection with the attempt to determine the cause(s) of the crankshaft failure, including without limitation any diesel engine tear-down, and permit representatives and consultants of the County to witness such examinations, tests and analyses.
3. That LILCO promptly provide the County with copies of all documents (as defined below), whether preliminary or final, as and when they come into LILCO's possession or under its control, pertaining to the crankshaft failure or the attempt to determine the cause(s) of the failure. 1/
4. That LILCO give the County reasonable advance notice of all meetings concerning the crankshaft failure which are to be attended by NRC Staff personnel, or to which such Staff personnel are invited, and that representatives and consultants of the County be invited to attend such meetings.
5. That LILCO promptly notify the County by telephone of any and all significant developments in the attempt to determine the cause(s) of the crankshaft failure.

For purposes of this request, the word "documents" is to be given its broadest meaning, to include, without limitation,

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1/ An example would be the report on the analysis of the oil in diesel generator No. 102, referred to by Mr. Novarro in his comments to the Cuomo Commission on August 17, 1983.

T. S. Ellis, Esq.  
August 18, 1983  
Page 3

correspondence, memoranda, written data, photographs, reports, notes, drawings, computer printouts, written analyses, and other forms of written data and material.

As you know, the Board's Memorandum and Order Deferring Filing of Testimony and Commencement of Hearing on Diesel Generators, dated August 16, 1983, requires the parties to file by August 25 a status report regarding any progress in determining the cause(s) of the crankshaft failure, and expects the parties to coordinate their "efforts and views." Other than your August 13 telephone call informing me of the failure, the County has not received any other information directly from LILCO regarding the crankshaft failure. This discovery request is consistent with the Board's August 16 Memorandum and Order, and obviously a rapid response by LILCO will be required if the County is to be capable of filing a meaningful status report with the Board.

Enclosed is a request to the Staff which we are delivering today concerning the crankshaft failure.

By the way, I should remind you that we have not yet received from LILCO the documents which were the subject of the County's August 12 Renewal of Motion to Compel Discovery, and which the Board in a conference call suggested be supplied to the County.

Very truly yours,

Alan Roy Dynner

ARD/dk  
Enclosure

cc: Bernard M. Bordenick, Esq.  
(By Telecopier)

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August 18, 1983

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(BY TELECOPIER)

Bernard M. Bordenick, Esq.  
U.S. Nuclear Regulatory Commission  
Washington, D.C. 20555

Dear Bernie:

Attached is a Request for Discovery which we telecopied today to Mr. Ellis concerning the crankshaft failure in diesel generator No. 102 at Shoreham. For the reasons stated therein, Suffolk County also is requesting the cooperation of the Staff concerning that failure and the attempt to determine its cause or causes, as follows:

1. That the Staff promptly notify the County of its plans (if any) to determine or assist in determining the cause(s) of the crankshaft failure, including what it intends to do and when.
2. That the Staff inform the County of, and permit County representatives to witness, examinations, tests or analyses carried out or witnessed by Staff personnel in connection with the attempt to determine the cause(s) of the crankshaft failure.
3. That the Staff promptly provide the County with copies of all documents, reports, analyses, and other data pertaining to the crankshaft failure or the attempt to determine its cause(s).
4. That the Staff give the County reasonable advance notice of all meetings with LILCO or its consultants concerning the crankshaft failure to be attended by Staff personnel, and that County representatives and consultants be invited to attend such meetings as observers.
5. That the Staff notify the County promptly by telephone of any and all significant developments in the

Bernard M. Bordenick, Esq.  
August 18, 1983  
Page 2

attempt to determine the cause(s) of the crankshaft failure.

Your cooperation in these reports will be greatly appreciated.

Very truly yours,

Alan Roy Dynner

ARD/dk  
Enclosure

cc: T. S. Ellis, Esq.  
(By Telecopier)

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FILE NO

DIRECT DIAL NO. 804 788-

August 23, 1983

Alan Roy Dynner, Esq.  
Kirkpatrick, Lockhart, Hill,  
Christopher & Phillips  
1900 M Street, N.W.  
8th Floor  
Washington, D.C. 20036

Dear Alan:

The purpose of this letter is to respond to your letter of August 18, which I received on August 19 when I returned to Richmond.

I do not agree with the assertion in your letter that "matters relating to the crankshaft failure are clearly relevant to the County's diesel generator contentions." As stated in LILCO's supplemental report on the diesel generators, dated August 16, LILCO does not believe that the crankshaft failure is related to issues that have been previously raised by the County and admitted by the Board in this proceeding. If you believe the crankshaft failure is related to these issues, please explain, if you can, precisely how they are related. Perhaps, an affidavit by one or more of your consultants explaining why the issues are related, if that is their view, would be more appropriate. I would be glad to reconsider the matter once I have had an opportunity to review any information you might send me.

Summarized below is information we intend to include in LILCO's August 25 status report to the Board concerning the diesel generator crankshaft matter. Please let us know in advance of August 25 if you have any comments. By copy of this letter we are asking Mr. Bordenick to do the same.

As you know, on August 12, in the course of testing following the installation of new cylinder heads, emergency diesel generator 102 was noted to experience unusual vibration and load fluctuations. The operators reduced load and then

## HUNTON & WILLIAMS

removed the engine from service. The engine was allowed to cool overnight and was examined on Saturday morning, August 13. Inspection revealed a failure in the crankshaft in the vicinity of the number 7 cylinder. Further investigation of the failure indicated that the crankshaft had experienced a crack that completely severed the shaft. LILCO is now conducting an investigation to determine the cause or causes of this failure.

The investigation of the cause or causes of the failure of the crankshaft of emergency diesel generator 102 will be conducted in accordance with a master plan that describes steps to be taken during the investigation of and recovery from the crankshaft failure. The plan is currently being reviewed by the Joint Test Group and should be approved tomorrow. We will telecopy it to you once it is approved. As the plan reflects, LILCO will use the resources of appropriate LILCO organizations, Stone & Webster Engineering Corporation, Transamerica Delaval and appropriate contractors to carry out the steps set out in the diesel generator master plan. In addition, as the plan also reflects, Failure Analysis Associates, a highly qualified and experienced organization in the field of failure analysis, has been engaged to aid in the investigation of the cause or causes of the crankshaft failure.

The master plan calls for moving the emergency diesel generator 102 from the diesel room to the turbine building where a clean area with controlled access will be established. TDI personnel will then disassemble the engine to permit removal of the failed crankshaft. Once removal is completed, the shaft will be sent to appropriate facilities offsite for additional failure analyses.

The master plan currently calls for replacement of the existing 13" x 11" crankshaft with a new 13" x 12" crankshaft. This replacement will also take place in the turbine building where the engine will be reassembled. Once reassembly is complete, it will be returned to the diesel room where it will be installed and reconnected to the diesel auxiliary equipment. As will be described more fully in the master plan, appropriate testing of the diesel will then be conducted.

At the same time the diesel generator 102 is being moved from the diesel generator room to the turbine building, LILCO is conducting inspections of crankshafts in diesel generators 101 and 103. As reported in LILCO's August 22 schedule report to the Board, indications have been found on diesel generator 103. That indication has been determined to be a 2 inch crack. Also, I was informed this afternoon that diesel generator 101 has an indication similar to the one found on diesel generator 103. LILCO is currently analyzing these indications and will take steps to factor this information into program outlined in the master plan.

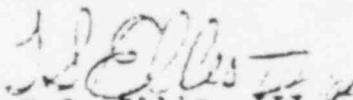
HUNTON & WILLIAMS

At the present time, it is LILCO's judgment that under the best of circumstances, Shoreham will not be ready to load fuel until some time in the first quarter of 1984. More precise estimates of the time it will take to complete the investigation and to repair emergency diesel generator 102 must necessarily await receipt of further information that will be obtained as a result of the investigation of the failure. At present, LILCO expects that the crankshaft will be removed from the engine approximately two weeks from today and that preliminary failure analysis results will be available two weeks later. Given this schedule, LILCO does not believe it would be productive to litigate the cylinder head issue in the next month or so.

We have just received today the County's notice of intention to file a new diesel generator contention on the crankshaft issue. We, of course, will review this filing to determine whether any response is necessary. In any event, it would seem to make sense to wait until more information is available before proceeding with any diesel generator litigation. Moreover, litigation of the cylinder head issue any time in the near future might interfere with LILCO's efforts to investigate and remedy the crankshaft situation because key personnel at LILCO, Stone & Webster and Delaval would be involved in testimony on the cylinder heads at the same time they would be involved in the crankshaft efforts.

I trust that this information will be helpful to the County in determining what information should be presented to the Board on the 25th.

Sincerely,

  
T.S. Ellis, III

221/765

cc: Bernard M. Bordenick, Esq.

UNITED STATES OF AMERICA  
NUCLEAR REGULATORY COMMISSION

BEFORE THE ATOMIC SAFETY AND LICENSING BOARD

\_\_\_\_\_) )  
In the Matter of ) )  
 ) )  
LONG ISLAND LIGHTING COMPANY ) )  
 ) )  
(Shoreham Nuclear Power Station, ) Docket No. 50-322 (O.L.)  
Unit 1) )  
\_\_\_\_\_)

CERTIFICATE OF SERVICE

I hereby certify that copies of Suffolk County's Motion to Compel Discovery have been served to the following this 26 day of August, 1983 by U.S. Mail, first class, except as otherwise indicated.

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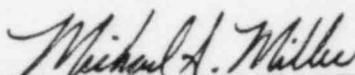
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DATE: August 26, 1983

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